

MEMORANDUM

TO: Pamela W. Barclay, Deputy Director, Health Resources
Maryland Health Care Commission

FROM: Christine M. Stefanides, RN, CHE
President and Chief Executive Officer

DATE: October 26, 2005

SUBJECT: Report of the Certificate of Need Task Force

Pam, again I want to express my regret for not being able to attend the final meeting of the Certificate of Need Task Force on Thursday, October 27, 2005. You will recall that I have commitments at Civista that will prevent my attendance.



I had a chance to review the draft Report of the Certificate of Need Task Force, and would like to offer the following comments:

- I continue to be concerned with the removal of Home Health from the CON process. I think this is totally inconsistent with the stand that we have taken with Hospice and I cannot see a rationale for a different recommendation for the two services. I believe the CON requirement for Home Health should be maintained.
- On the subject of rationales, it would be helpful to articulate the rationale for each recommendation in the body of the report. I know that this can be found embedded in the minutes in most cases, but I think finding rationales will be a difficult task for the Commission as they consider our recommendations.
- We spoke early on in the Task Force meetings about the need for batching CON applications. I would suggest that with the adoption of these recommendations to streamline the CON application processes, that the practice of batching CON applications be discontinued as soon as possible.
- Finally, I believe the Task Force's recommendations on shell space be proposed unconnected with any other decision with regard to occupancy, etc. The shell space recommendation should be adopted as proposed.

I hope that these comments will be helpful to you and Chairman Nicolay as the Task Force finalizes its work on Thursday. I have appreciated the opportunity to serve on the Task Force.

CS:dkg